

MONTGOMERY McCRACKEN WALKER & RHOADS LLP

(A Limited Liability Partnership Formed in Pennsylvania)

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*Counsel for Defendants Inspira Health Network, Inc.
and Inspira Medical Centers, Inc.*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**IN RE: NEW ENGLAND
COMPOUNDING PHARMACY, INC.
PRODUCTS LIABILITY LITIGATION**

Document Electronically Filed

MDL No. 1:13-md-2419-FDS

THIS DOCUMENT RELATES TO:

*Hannah v. New England Compounding Pharmacy,
Inc. et al.*, Docket No. 13-cv-10407;
*Jones v. New England Compounding Pharmacy,
Inc. et al.*, Docket No. 13-cv-10409;
*Ramos v. New England Compounding Pharmacy,
Inc. et al.*, Docket No. 13-cv-10410;
*Rios v. New England Compounding Pharmacy,
Inc. et al.*, Docket No. 13-cv-10411;
*Rivera v. New England Compounding Pharmacy,
Inc. et al.*, Docket No. 13-cv-10412;
*Tayvinsky v. New England Compounding Pharmacy,
Inc. et al.*, Docket No. 13-cv-10414;
*Gould v. New England Compounding Pharmacy,
Inc. et al.*, Docket No. 13-cv-10444; and
*Normand v. New England Compounding Pharmacy,
Inc. et al.*, Docket No. 13-cv-10447

**MOTION FOR ADMISSION OF
MICHAEL B. HAYES, *PRO HAC VICE***

Pursuant to Local Rule 83.5.3, Defendants Inspira Health Network, Inc. and Inspira Medical Centers, Inc. (formerly known as South Jersey Health System, Inc. and South Jersey Hospital, Inc.) (collectively, “Inspira”), by their undersigned attorney, move this Court to admit

Michael B. Hayes, of the law firm Montgomery, McCracken, Walker & Rhoads, LLP, *pro hac vice* for purposes of the above-captioned matters, and state:

1. The undersigned is a partner at the law firm of Montgomery, McCracken, Walker & Rhoads, LLP, located at LibertyView, Suite 600, 457 Haddonfield Road, Cherry Hill, New Jersey 08002, and is a member in good standing of the bars of the State of New Jersey, the Commonwealth of Pennsylvania, the State of New York, the United States Supreme Court, the United States Court of Appeals for the Third Circuit, and the United States District Courts for the District of New Jersey, the Eastern District of Pennsylvania, and the Eastern District of Michigan.

2. The undersigned was counsel of record for Inspira in these actions prior to transfer by the Judicial Panel for Multidistrict litigation and, pursuant to this Court's February 15, 2013 Order, MDL Order No. 1 (Doc. No. 4 in MDL No. 1:13-md-02419), is exempted from the local rule requiring retention of a local attorney and *pro hac vice* admission.

3. Attorney Michael B. Hayes, is a partner at the law firm of Montgomery, McCracken, Walker & Rhoads, LLP, located at 123 South Broad St., Philadelphia, Pennsylvania 19109, and is a member in good standing of the Bars of the State of New Jersey, the United States District Court for the District of New Jersey, the Commonwealth of Pennsylvania, the United States District Courts for the Eastern and Middle District of Pennsylvania, and the United States Court of Appeals for the Third Circuit.

4. As shown by his Declaration filed herewith: (i) Michael B. Hayes, is a member in good standing of the Bar in every jurisdiction in which he has been admitted to practice; (ii) there are no disciplinary proceedings pending against him as a member of the Bar in any

jurisdiction, and (iii) Mr. Hayes is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

5. The required filing fee in the amount of \$100.00 has been paid.

WHEREFORE, Inspira moves for the admission of Attorney Michael B. Hayes, *pro hac vice*, to appear as co-counsel in the above-referenced matters.

Respectfully submitted,

MONTGOMERY, McCRACKEN, WALKER
& RHOADS LLP

Dated: September 19, 2013

/s/Stephen A. Grossman

Stephen A. Grossman (NJ Bar ID 033681997)
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*Counsel for Defendants Inspira Health Network,
Inc. and Inspira Medical Centers, Inc.*

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been filed with the Clerk of the Court on September 19, 2013 using the CM/ECF system which sent notification of this filing to all ECF registered counsel of record via e-mail generated by the Court's ECF system.

/s/Stephen A. Grossman
Stephen A. Grossman